

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

JAMIE KAUFMANN WOODS,)	
et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.: 1:03CV00105 CAS
)	
BOB WILLS, et al.)	
)	
Defendants.)	

DEFENDANTS' PRETRIAL

Pursuant to the Court's March 4, 2004 Case Management Order and subsequent amendments, Defendants submit their Pretrial:

A. Witnesses

Defendants may call the following witnesses at trial:

1. Bob Wills
2. Betty Sue Wills
3. Sam Gerhardt
4. Deborah Gerhardt
5. Julie Gerhardt
6. Sharon Goodman
7. Andrea Hill
8. Patrick Donley
9. Wayne Stillings, M.D.
10. Christopher Long, Ph.D.
11. Kenneth D. Asher, D.O.

12. Richard Gayle, D.O.

13. Lisa Robinson

14. Laura Mathews

Defendants reserve the right to call other witnesses for purposes of impeachment, and

Defendants reserve the right to supplement this list as necessary.

B. Exhibits

Defendants may offer the following exhibits at trial:

Exhibit Letter	Description	Objection/ Ruling
A	Application for Admission of Tracey Brazil	
B	1996 Power of Attorney for Tracey Brazil	
C	Acknowledgement of Notice of Parental Responsibility for Tracey Brazil	
D	Medicine Log for Tracey Brazil	
E	2/14/98 Letter from Tracey Brazil to Debby Gerhardt	
F	Application for Admission of Jessica Brazil	
G	1997 Power of Attorney for Jessica Brazil	
H	Acknowledgement of Notice of Parental Responsibility for Jessica Brazil	
I	Medicine Log for Jessica Brazil	
J	Notice from Dr. Richard Gayle of clean gynecological exam for Jessica Brazil	
K	Application of Admission for Jamie Kaufmann	
L	1999 Power of Attorney for Jamie Kaufmann	
M	Mountain Park Parent/Guardian Agreements and Acknowledgements	

N	Parent Visit Reports for Jamie Kaufmann	
O	Medication Log for Jamie Kaufmann	
P	7/10/00 Letter from Jamie Kaufmann to Debby Gerhardt	
Q	Application for Admission of Shari Lueken	
R	2000 Power of Attorney for Shari Lueken	
S	Mountain Park Parent/Guardian Agreements and Acknowledgements	
T	Notice of Parental Responsibility for Shari Lueken	
U	Prescription from Dr. Richard Gayle to Shari Lueken dated 1/10/01, and corresponding bill form	
V	Medication Log for Shari Lueken	
W	Application for Admission of Erika Teasley	
X	Power of Attorney for Erika Teasley	
Y	Mountain Park Educational, Boarding and Hold Harmless Agreement for Erika Teasley	
Z	Notice of Parental Responsibility for Erika Teasley	
AA	Mountain Park Parent/Guardian Agreements and Acknowledgements	
BB	Medication Log and Medical Information Sheet for Erika Teasley	
CC	Dental Records on Erika Teasley from Michael Price, DDS	
DD	Billing records on dentist visit for Erika Teasley	
EE	Mountain Park Parent/Student Handbook and revisions	
FF	Curriculum Vitae of Kennett Asher, D.O.	

GG	Report from Kennett D. Asher, D.O.	
HH	Curriculum Vitae of Wayne Stillings, M.D.	
II	Report of Wayne Stillings, M.D.	

Defendants reserve the right to supplement their Exhibit List, and Defendants reserve the right to refer to exhibits offered by Plaintiffs.

C. Deposition Excerpts

At this time, Defendants have no excerpts that they intend to read into the record at trial. However, Defendants reserve the right to use deposition excerpts for purposes of impeachment during witness examination. Defendants also reserve the right to supplement their disclosure as necessary.

D. Interrogatory Answers

None at this time. Defendants reserve the right to identify interrogatory answers in response to plaintiffs' pretrial.

E. Jury Instructions

Defendants will submit proposed converse and/or defense instructions as necessary in response to plaintiffs' proposed verdict directors and other instructions.

F. Trial Brief

Submitted herewith.

Respectfully submitted,

BROWN & JAMES, P.C.

/s/ John D. Briggs
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2005, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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